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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

**SECOND STATUS UPDATE,
STIPULATION, AND [PROPOSED]
ORDER REGARDING PLAINTIFFS'
AND YOUTUBE'S DMCS RIPE
DISPUTES ISSUES 2 AND 3**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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19 Defendants YouTube, LLC and Google LLC (together, "YouTube"), and PI/SD Plaintiffs
20 (collectively, the "Parties"), respectfully submit this update and stipulation to the Court:

21 WHEREAS, on October 18, 2024, the Parties filed a Discovery Case Management
22 Statement (in advance of the October 24, 2024 Discovery Case Management Conference),
23 providing the Court with discovery updates, including ripe discovery disputes. With respect to
24 YouTube, the Parties raised, among other things, Ripe Dispute No. 2 [*YouTube's Amended*
25 *Responses or Confirmation in Writing of Agreements Reached by Parties*], and Ripe Dispute No.
26 3 [*YouTube's Search of Non-Custodial Sources Identified by PI/SD Plaintiffs*]. The Parties
27 provided their substantive positions on Ripe Dispute No. 2 in the Discovery Case Management
28 Statement and reported that they intended to file a joint letter brief on Ripe Dispute No. 3 by

1 October 22, 2024, so that both issues could be considered by the Court at the October 24, 2024
2 conference.

3 WHEREAS, on October 22, 2024, the Parties submitted a Status Update, Stipulation, and
4 Proposed Order Regarding Plaintiffs' and YouTube's DMCS Ripe Disputes Issues 2 and 3, in
5 which the Parties respectfully requested that the Court defer decision on these disputes so that the
6 Parties can engage in further meet and confers. *See* ECF 1246. In the proposed order, the Parties
7 requested that the deadline for briefing on Issues 2 and 3 be no later than November 15, 2024. *See*
8 *id.*

9 WHEREAS, on October 23, 2024, the Court entered the Proposed Order Regarding
10 Plaintiffs' and YouTube's DMCS Ripe Disputes Issues 2 and 3, setting the briefing deadline for
11 November 15, 2024. *See* ECF 1250 ("the Order").

12 WHEREAS, on October 25, 2024, YouTube provided to Plaintiffs, in writing, agreed upon
13 information regarding its search of non-custodial sources pursuant to the parties' Stipulation.

14 WHEREAS, since the issuance of the Order and YouTube's October 25, 2024
15 correspondence providing agreed upon information regarding its search of non-custodial sources,
16 the Parties have met and conferred and exchanged additional information that informs the scope
17 of the Parties' dispute on Issues 2 and 3. The discussions remain on going, and the Parties request
18 additional time to meet and confer.

19 NOW AND THEREFORE, the Parties respectfully request that the Court modify the
20 timeline set forth in the Order so that the Parties can engage in further meet and confers, and that
21 the Court adopts the following schedule to ensure timely and efficient briefing of these issues:

- 22 a. No later than November 18, 2024, the Parties will hold a meet and confer on Ripe
23 Dispute Issues 2 and 3;
- 24 b. No later than December 2, 2024, the Parties will hold an H(2) on any remaining
25 issues on Ripe Dispute Issues 2 and 3; and,
- 26 c. No later than December 10, 2024, the Parties will file joint letter briefs as to any
27 remaining issues on Ripe Dispute Issues 2 and 3, so that the Court may consider the briefs
28 at the December Discovery Case Management Conference.

d. The Parties agree to meet and confer in good faith at Plaintiffs' reasonable request for information regarding YouTube's search and production from non-custodial sources newly identified by Plaintiffs in YouTube's document production that appear likely to contain relevant information or in response to an identified deficiency. Plaintiffs agree that they will be reasonable and judicious in making any such requests.

IT IS SO STIPULATED AND AGREED,

DATED: November 15, 2024

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

By: /s/ Lauren Gallo White

Brian M. Willen (*pro hac vice*)

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DATED: November 15, 2024

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 15, 2024

By: /s/ Lauren Gallo White
Lauren Gallo White

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED: _____

Hon. Peter H. Kang
United States District Court Magistrate Judge